



February 25, 2022

Honorable Katie Cristol, Chair
Arlington County Board
Ellen M. Bozman Government Center
2100 Clarendon Blvd, Suite 300
Arlington, VA 22201

Re: Update of Standard Site Plan Conditions

Dear Chair Cristol:

The Forestry and Natural Resources Commission (FNRC) understands that CPHD Planning staff is currently working on updates to the Standard Site Plan Conditions. As frequent participants in the site plan process, members of FNRC, along with our colleagues on several other commissions, have identified a number of issues with the current process and recommend a number of changes to the Standard Site Plan Conditions, listed below:

1) Issue: Changes to/diminished community benefits after approval of site plans

Recommendation:

- Changes to community benefits post site plan approval should require relevant commission review and a neighborhood public engagement process.
- Relevant commissions should then submit recommendations to Planning Commission and County Board, with an analysis of the proposed changes to the adopted plan.

2) Issue: Changes in landscaping and public spaces after approval of site plans (often as result of conflicts with Civil Engineering Plan)

Recommendation:

- Final Civil Engineering Plan and Final Landscaping Plan should be submitted simultaneously, earlier in the process, and prior to adoption of site plan.
- Reductions in approved vegetated areas from approved site plan should be required to be made up on site or require a public review process. (Use Pentagon City Sector Plan with minimum 10% shrub and vegetated area as a goal.)
- Ensure consistency of Privately Owned Public Spaces with PSMP Design Guidelines (p. 235), and prohibit non-park related uses (elevator shafts, loading areas, other obstructions) on publicly eased spaces.

3) Issue: Lack of transparency in the process (administrative changes with no public review, additional issues such as fire department or health department exercising veto power after approval)

Recommendation:

- Clarify what constitutes an administrative change versus what the community is likely to perceive as substantive changes to an adopted site plan.
- Ensure engagement of fire and health departments earlier in the process (before County Board consideration).

4) Issue: “Minor” site plan amendments with major implications (Examples of “minor” site plan amendments with material changes after the fact: elimination of public access to Central Place Observatory, proposal for adding retail pavilions in Clarendon Market Place, loss of designated community meeting spaces in Ballston, Rosslyn, etc.)

Recommendation:

- “Minor” site plan changes that affect community benefits should require relevant commission review and a neighborhood public engagement process.
- Relevant commissions should submit a report to Planning Commission and County Board, with an analysis of the proposed changes to the adopted plan.

5) Issue: Need to incorporate biophilic design principles and expectations early in the process

Recommendation:

- Move public space discussion to earlier in the SPRC process, and consider siting and architecture as integral to public space and biophilic design. Landscaping and biophilic design should not be an after-thought after all of the other needs are met.
- Develop an inventory of biophilic design features and guidelines.
- Projects should include a biophilic narrative including how the project exceeds minimum requirements for tree canopy, shrub and vegetated areas, as well as any unique biophilic design elements.

6) Issue: Cost for failure to replace trees on site has not changed since inception of the Tree Canopy Fund program in 2007

Recommendation:

- At a minimum, increase the tree canopy fund contribution from current \$2,400 per tree to a CPI adjusted cost of \$3,334, and adjust annually in accordance with CPI.
- Consider significantly raising the cost to \$10,000 to encourage more preservation of existing trees and tree planting on site.

- Consider establishing a lost capacity fee to be assessed annually based on estimated ecosystem benefits of lost trees until replacement trees can provide equivalent services.
- This is consistent with the existing Urban Forest Master Plan (p. 34): “Explore reviewing the tree replacement guidelines to ensure that the tree replacement formula better reflects an equitable calculation for the value of trees lost.”

7) Issue: Large canopy trees, that provide significant storm water and other critical ecosystem services, are routinely destroyed during the development process, even when there is the possibility that they could be saved.

Recommendation:

- Develop meaningful incentive program for preservation of large canopy trees, such as storm water credits, variances in setbacks, more flexibility with parking, additional density, etc.

We look forward to exploring these issues more fully and appreciate this opportunity to share our views.

Sincerely,



Phil Klingelhofer, Chair
Forestry and Natural Resources Commission

Cc: Members, Arlington County Board
Members, Planning Commission
Mark Schwartz, Arlington County Manager
Claude Williamson, Director, Department of Community Planning, Housing and Development